REMARKS

Docket No.: M4065.0862/P862

Applicants gratefully acknowledge the Examiner's statement that claims 13-15, 30 and 38 contain allowable subject matter. Claims 1 and 13 have been amended. Claims 16-23, 31, 32, 34 and 39 have been canceled. Claims 1, 2, 4-12, 14, 15, 25 and 35-38 are now pending in this application.

Claims 1, 13 and 21 stand objected to based on certain informalities.

Applicants have amended claims 1 and 13, as suggested by the Office Action, to address the concerns of the Office Action. Claim 21 has been canceled and thus, the objection regarding the claim is no longer applicable. Accordingly, Applicants request that the objections relating to claims 1 and 13 be reconsidered.

Claims 16-23, 31, 32, 34 and 39 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Decker. Claims 16-23, 31, 32, 34 and 39 have been canceled and thus, this rejection is now moot. Applicant reserves the right to present these or similar claims in a continuation application.

Claims 1-3, 7-12, 25, 28, 29 and 35-37 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Decker in view of Takahashi. Claims 4-6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Decker and Takahashi and in further view of Nair. The rejections are respectfully traversed.

Claim 1 recites, *inter alia*, an apparatus comprising "a first isolation circuit coupled to each first bus for selectively isolating each group from the readout circuit, the first isolation circuit comprising a switch for selectively connecting the first bus to a predetermined voltage." Claim 25 recites, *inter alia*, a method of obtaining a readout of a pixel sensor array comprising "selectively isolating from said readout circuit the groups of pixels not associated with the selectively enabled group select circuit by

disabling the subgroup select circuits and group select circuits not associated with the selectively enabled group select circuit and applying a predetermined voltage to at least one first bus coupled to the disabled group select circuits by operating a switch coupled to the at least one first bus."

Applicants respectfully submit that there is no motivation to combine the cited references, Decker, Takahashi or Nair, to achieve any of the claimed inventions and even if motivation is present, the claimed invention would not be attained.

The claimed invention is directed to, <u>inter alia</u>, "a first isolation circuit coupled to each first bus for selectively isolating each group from the readout circuit." As noted inthe Office Action, Decker fails to disclose or suggest the "first isolation circuit." (Office Action at 8). Thus, Decker does not disclose or suggest all limitations of the claimed invention. The Office Action seeks to overcome these deficiencies of Decker by combining it with Takahashi to achieve the inventions defined in claims 1 and 25.

Takahashi generally relates to an input circuit having a plurality of channels provided with input ports and input/output ports to overcome interference, crosstalk, incorrect input of the information, and improve data processing accuracy. The Office Actions cites Takahashi as teaching the isolation circuit of the claimed invention. (Office Action at 8-9). However, Applicants respectfully submit that Takahashi does not disclose an isolation circuit which isolates a first bus coupled to the outputs of subgroup circuits, as in the claimed invention. In Takahashi, transistor (23-x), for example, biases only its associated individual line (12'-x) to ground, which biasing only occurs when the individual line (12'-x) is isolated from a bus connected to node (N) by a transistor (22-x). In other words, Takahashi biases each line individually which is

isolated from a bus using a transistor when selecting a signal path for each line being readout, but it does not bias a "first bus."

The claimed invention, on the other hand, "selectively [isolates] each group from the readout circuit." The claimed invention isolates the first bus, and thus all associated group select circuits, and not just the individual selected circuit or line being readout.

Accordingly, even if Takahashi were combinable with Decker, it would still not teach or suggest the claimed invention.

For at least the same reasons, Decker and Takahashi do not teach or suggest "selectively isolating from said readout circuit the groups of pixels not associated with the selectively enabled group select circuit by disabling the subgroup select circuits and group select circuits not associated with the selectively enabled group select circuit and applying a predetermined voltage to at least one first bus coupled to the disabled group select circuits by operating a switch coupled to the at least one first bus," as recited in claim 25.

Consequently, claims 1 and 25 should be allowable. Claims 2, 7-12, 14, 15, 35, 37 and 38 depend from claim 1 and should be allowable along with claim 1. Claim 36 depends from claim 25 and should be allowable along with claim 25.

The Office Action additionally rejects dependent claims 4-6 by combining Nair to the previously discussed cited references. Claims 4-6 depend from claim 1 and thus, recite the limitations noted above which are not taught or suggested by Takahashi and Decker, even when considered in combination. Nair is simply cited by the Office Action as teaching the ability to optimize readout speed and minimizing power consumption. (Office Action at 12). Nair does not teach or suggest selectively isolating

a group of select circuits from the readout circuit and thus, does not cure any of the shortcomings of Decker and Takahashi. Therefore, the combination of Decker, Takahashi and Nair, likewise, fails to teach or suggest all limitations of claim 1 and dependent claims 4-6.

Moreover, there is no suggestion in the cited references to combine their disparate teachings to achieve the claimed invention. Thus, it would not have been obvious to one of ordinary skill in the art to combine the cited references to achieve the claimed invention.

Accordingly, Applicants respectfully request that the rejections be withdrawn and claims 1, 2, 4-12, 14, 15, 25 and 35-38 be allowed.

In view of the above amendment, Applicants believe the pending application is in condition for allowance.

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Respectfully submitted,

Thomas J. D'Amico

Registration No.: 28,371

DICKSTEIN SHAPIRO MORIN &

OSHINSKY LLP

2101 L Street NW

Washington, DC 20037-1526

(202) 785-9700

Attorneys for Applicant